

**REMARKS**

In accordance with the foregoing, labels are provided for the Figs. 1-4 consistent with the requirement of Item 1 of Action but taking into account as well the explanation in the specification at page 13, lines 8-15 that a PDP device in accordance with the embodiments of the present invention may have a configuration as shown in Fig. 1 but is not limited thereto. Further, labels are provided for Figs. 2-4, clarifying the same illustrative conventional subfield method and drive waveforms for a conventional gradation display.

Further, in accordance with the foregoing, claim 1 has been amended to better clarify the present invention and new claim 21 is added. No new matter is presented and, accordingly, approval and entry of the foregoing labels in the figures, amendment to claim 1 and new claim 21 are respectfully requested.

**ITEM 1: REJECTION OF CLAIMS 1-2, 4, 9-10 AND 19-20 FOR ANTICIPATION UNDER 35 U.S.C. 102 (b) BY AWAJI (JP 2000-148085); AND**

**ITEMS 6-13: REJECTION OF VARIOUS RESPECTIVE DEPENDENT CLAIMS OVER THE PRIMARY REFERENCE TO AWAJI, AS ABOVE, AND ONE OR MORE OF NAKA et al. (ITEM 6), TOKUNAGA et al. ('540), TOKUNAGA et al. ('425), MOON (ITEM 10), HASHIMOTO et al. AND TOKUNAGA et al ('106) AND KANAZAWA et al. ('993), VARIOUSLY IN ITEMS 6-13 OF THE ACTION.**

The rejections are respectfully traversed.

As clearly recited in claim 1, according to the present invention, all of the cells to be lit in a display field are lit by causing light emission in a sustain period in a predetermined subfield, among the plurality of subfields making up the display field. In other words, cells not to be lit in a display field are not lit. This constitution is clearly shown in Fig. 6; specifically, as shown therein, the gray scale 0 has no subfield to be lit. This is the same condition as is recited in claim 21.

To the contrary of the conditions specified in the independent claims 1 and 21, the Examiner asserts that Awaji (JP2000-148085A) discloses a constitution in which all of the cells to be lit in a display field are lit in a predetermined subfield among the plurality of subfields making up the display field. However, Applicants respectfully submit that Awaji discloses a constitution in which all of the cells - - including cells which are not to be lit, are lit in a predetermined subfield in order to increase a background brightness. In other words, Awaji does not disclose or suggest the constitution of the present invention.

Accordingly, Awaji clearly does not support the anticipation rejection of the claims enumerated in Item 3 of the Action - - and all of the dependent claims inherit the patentably distinctions defined by those claims enumerated in Item 3 and the same accordingly as well patentably distinguish over the references of record, taken singularly or in any proper combination.

**LACK OF PRIMA FACIE DEMONSTRATION OF OBVIOUSNESS OF THE COMBINATIONS RELIED UPON**

It is respectfully submitted that the Action fails to meet the standards required to support the reliance on combinations of references. The ground advanced for the reliance on the combinations of references, throughout is merely that it would have been obvious to one "of ordinary skill in the art" to make the combinations - - which is emphatically rejected as inadequate. See, MPEP 706.02(j), which emphasizes that the Examiner should set forth in the Office Action:

- (A) the relevant teachings of the prior art relied upon, preferably with reference to the relevant column or page number(s) and line number(s) where appropriate,
- (B) the difference or differences in the claim over the applied reference(s),
- (C) the proposed modification of the applied reference(s) necessary to arrive at the claimed subject matter, and
- (D) an explanation why one of ordinary skill in the art at the time the invention was made would have been motivated to make the proposed modification.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See **MPEP § 2143 - § 2143.03** for decisions pertinent to each of these criteria.

**CONCLUSION**

In accordance with foregoing, it is respectfully submitted that the pending claims distinguish patentably over the references of record, taken singularly or in any proper combination. There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance, which action is earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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